

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<i>Caption in Compliance with D.N.J. LBR 9004-1(b)</i> SAUL EWING LLP Stephen B. Ravin, Esquire Turner N. Falk, Esquire One Riverfront Plaza 1037 Raymond Blvd., Suite 1520 Newark, NJ 07102-5426 Telephone: (973) 286-6714 E-mail: stephen.ravin@saul.com turner.falk@saul.com	
<i>Counsel to the Debtors and Debtors in Possession</i>	
In re:	
NEW JERSEY ORTHOPAEDIC INSTITUTE LLC, <i>et al.</i> ,	
	Debtors. ¹

Chapter 11

Case No. 25-11370 (JKS)

(Jointly Administered)

Re: Doc. No. 68

**CERTIFICATE OF NO OBJECTION TO DEBTORS' MOTION FOR ENTRY OF
AN ORDER EXTENDING THE DEBTORS' EXCLUSIVE PERIODS TO
FILE A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON**

The undersigned counsel to the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) hereby certifies that:

1. On May 20, 2025, the *Debtors' Motion for Entry of an Order Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Votes Thereon* [D.I. 68] (the “**Motion**”) was filed with the Court.

¹ The last four digits of Debtor New Jersey Orthopaedic Institute LLC's tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC's tax identification number are 9828. The location of both Debtors' principal place of business and the Debtors' service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

2. Pursuant to the Notice of Motion [D.I. 68], objections, if any, to the Motion were required to have been filed with the Court and served on the undersigned so as to be received on or before June 3, 2025 (the “**Objection Deadline**”).

3. The Objection Deadline has passed and no objections or responses were served upon the undersigned counsel or entered on the Court’s docket.

4. Accordingly, the Motion may be approved.

WHEREFORE, the Debtors respectfully request that an order, substantially in the form attached to the Motion and hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: June 4, 2025

SAUL EWING LLP

By: /s/ Stephen B. Ravin
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EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

NEW JERSEY ORTHOPAEDIC INSTITUTE LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 25-11370 (JKS)

(Jointly Administered)

**ORDER PURSUANT TO 11 U.S.C. § 1121 EXTENDING
THE DEBTORS' EXCLUSIVE PERIOD TO FILE
A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON**

The relief set forth on the following pages numbered two (2) through three (3) is hereby
ORDERED.

¹

The last four digits of Debtor New Jersey Orthopaedic Institute LLC's tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC's tax identification number are 9828. The location of both Debtors' principal place of business and the Debtors' service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

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Debtors: New Jersey Orthopaedic Institute LLC, *et al.*

Case No. 25-11370 (JKS)

Caption: ORDER PURSUANT TO 11 U.S.C. § 1121 EXTENDING THE DEBTORS' EXCLUSIVE PERIOD TO FILE A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON

AND NOW, upon consideration of the of the Debtors' Motion (the "Motion")² for entry of an order, pursuant to section 1121(d) of the Bankruptcy Code, (a) extending the Debtors' Exclusive Filing Period by 120 days, through and including October 8, 2025, and (b) extending the Debtors' Exclusive Solicitation Period by 120 days through and including December 8, 2025, and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided; and after due deliberation; and sufficient cause appearing therefor, it is hereby ORDERED and DECREED as follows:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 1121(d) of the Bankruptcy Code, the period in which the Debtors have the exclusive right to file a chapter 11 plan or plans is extended through and including October 8, 2025.
3. Pursuant to section 1121(d) of the Bankruptcy Code, the period in which the Debtors have the exclusive right to solicit acceptances of a chapter 11 plan is extended through and including December 8, 2025.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

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Debtors: New Jersey Orthopaedic Institute LLC, *et al.*

Case No. 25-11370 (JKS)

Caption: ORDER PURSUANT TO 11 U.S.C. § 1121 EXTENDING THE DEBTORS' EXCLUSIVE PERIOD TO FILE A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON

4. The entry of this Order is without prejudice to the Debtors' right to seek a further extension of the Exclusive Periods under section 1121 of the Bankruptcy Code.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. This Court retains jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.